

EXHIBIT

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From: Johnson, ScottM
Sent: Friday, October 31, 2014 11:58 AM
To: Tim Mills 8720; David Beck 8720
Cc: Riley, Bobbie; Price, Nikki; Berggren, Lynette; Johnson, ScottM
Subject: Enhanced SOM Pilot **URGENT**
Attachments: image001.jpg; Ponca SOM triggers and scenarios v2.docx; Ponca worksheet SOM 9-12-14.xlsx

Follow Up Flag: Follow up

Tim,

Based on our call yesterday, we have decided to proceed to the next step by enhancing the SOM pilot. We will ask you to turn on the new process and run it in parallel with the current process. We want to capture the data for both components to assess. Please confirm you will turn this on possibly even today?

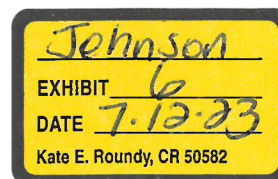
David,

Please continue your current SOM calls to stores as you are doing today and apply the new questions previously developed. I have attached the questions for your convenience. Please have Sandi Evans or yourself send the daily response to both Nikki and myself. Do not make calls on the enhanced pilot that Tim will turn on. Please show us which products would qualify though, again so we can assess.

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Ponca SOM triggers and scenarios 8-8-14

Ponca will track 82 SKUs of controlled substances and lifestyle medications. Attached are the quantities above the average that would trigger a phone call to verify the order quantity with the store team.

When an associate from Ponca calls a store to verify the order quantity, only the following reasons below will be accepted to retain the original order quantity. The Ponca associate is not to prompt the store with a valid response. If the store does not give one of the following reasons, the order quantity will be cut back to the average of the past 11 orders. Ponca will supply Procurement and Compliance the call log report every week for the past week's orders.

- Recent acquisition
 - Procurement emails Ponca when an acquisition has occurred so the Ponca associate should be able to validate this through this email.
- Change of package size, i.e. 500 to 100 count bottles
- Change in exclusivity of a local or national insurance plan
 - Request name of plan
 - When did store become eligible?
 - How many scripts have been generated?
- Warehouse outage
- New item in the warehouse
- New clinic/prescriber opened an office nearby
 - What is the name and type of practitioner?
 - When did it open?
 - How far away is the new facility/prescriber?
 - Approximately, how many additional prescriptions a week is the pharmacy receiving?
- Pharmacy promotion
 - Start and end dates for the promotion?
- Competitor closure
 - What competitor closed and when?
 - How far away is the competitor in miles?
 - How many additional prescriptions a week has the pharmacy increased?
- PDX locations only- Rx Manager went on vacation and increased inventory

Below are considered non-valid reasons and will not be accepted as a reason to retain the higher order quantity:

- Have prescriptions waiting
- Have new patients and/or CASH prescriptions

The Ponca associate should not prompt the pharmacy team with a valid reason.

In addition, an analyst at Ponca should conduct trending on the store teams to indicate a store is consistently ordering above their average to identify a need to increase their thresholds or potentially report as suspicious to the DEA. When a store is identified, Compliance and Procurement should be notified for additional investigation.